

## REMARKS

The Application has been carefully reviewed in light of the Office Action dated February 17, 2004. Claims 1 to 21 are in the application, of which Claims 1, 9, 10 and 11 are the independent claims. Claims 1, 2 and 7 to 11 are being amended. Reconsideration and further examination are respectfully requested.

Claims 1, 5, 6, 8 to 11 and 18 to 21 are rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,249,644 (Inoue) and U.S. Patent No. 5,845,160 (Patton), and Claims 3, 4, 7 and 12 to 17 are rejected under 35 U.S.C. § 103(a) over Inoue, Patton and U.S. Patent No. 5,761,485 (Munyan). Reconsideration and withdrawal of the rejections are respectfully requested.

The invention concerns a virtual image album system by which image data is accessible. The system uses a card with a substrate and a memory device. Indicia representing the image data is formed on the substrate. The card's memory device includes mapping data that defines a bounding box delineating a mapped position of each indicium on the substrate. In addition, the mapping data stored in the card's memory associates the mapped position with corresponding function data stored in the memory device identifying at least one function to be performed including a function to reference image data. The card is inserted into a card reader which has a touch sensitive membrane arranged to overlay the card and through which the indicia is visible. When a user selects one of the indicia, touch coordinates associated with the user's selection are processed and function data associated with a selected indicium is output if the touch coordinates correspond to the bounding box associated with the selected indicium.

By virtue of this arrangement, indicia used for selection, together with mapping data and function data used to identify functions to be performed based on a selection, are portable with the card.

Turning to the specific language of the claims, Claim 1 defines a virtual image album system comprising a card and a card reader for the card. The card comprises a memory device and a substrate having indicia formed thereon which is representative of image data accessible via the card. The memory device stores mapping data that defines, in relation to each indicium, a bounding box delineating a mapped position of the indicium on the substrate, the mapping data is further arranged to associate the mapped position of the indicium on the substrate with corresponding function data stored in the memory device identifying at least one function to be performed. The reader which comprises a touch sensitive membrane arranged to overlay the inserted card and through which the indicia are visible, is adapted to process touch coordinates in response to a user selection of the indicium and to output specific function data associated with the selected indicium if the touch coordinates correspond to the bounding box associated with the selected indicium, the at least one function including a function to reference specific image data.

The applied art, namely Inoue and Patton, is not seen to teach or to suggest the invention, particularly with respect to the features of: 1) a card having a memory device storing mapping data defining a bounding box delineating a mapped position of each indicium formed on a substrate of the card and associating the mapped position with function data stored in the memory device identifying at least one function to be performed, 2) a reader, into which the card is inserted, which processes touch coordinates

in response to a user selection and outputs the function data associated with a user selection of an indicium if the touch coordinates correspond to the bounding box associated with the selected indicium, and 3) the at least one function of the function data output includes a function to reference specific image data.

It is conceded in the Office Action, at pages 3 and 4, that Inoue fails to teach a card substrate having a memory device associated therewith, which includes mapping data, and function data associated with indicia of the card and the image data. It is further submitted that Inoue does not teach a card's memory device storing mapping data that defines for each indicium on the card's substrate a bounding box delineating a mapped position of the indicium on the substrate and that associates the mapped position of the indicium with function data stored in the memory device identifying at least one function to be performed, and/or a reader processing touch coordinates and outputting function data associated with a selected indicium if the touch coordinates correspond to the bounding box associated with the selected indicium, the at least one function including a function to reference specific image data.

Patton is not seen to remedy the deficiencies of Inoue. Patton is seen to describe a computer associating a sound recording with digital image prints using a signal received from an input unit 32 and the computer's data store 12. Figure 1 of Patton shows the input unit 32 which receives an index print 14 with images and a support 24 having an audio data storage 20 which stores sound recordings 22. Commencing at col. 7, line 5, Patton is seen to describe using switches 38, which when actuated send a signal identifying the selected switch to computer 50, which processes the signal using store 12 of computer

50. (See col. 9, lines 12 to 46 and Figure 8 of Patton)

Patton is not seen to disclose the features of: 1) a card having a memory device storing mapping data defining a bounding box delineating a mapped position of each indicium formed on a substrate of the card and associating the mapped position with function data stored in the memory device identifying at least one function to be performed, 2) a reader, into which the card is inserted, which processes touch coordinates in response to a user selection and outputs the function data associated with a user selection of an indicium if the touch coordinates correspond to the bounding box associated with the selected indicium, and 3) the at least one function of the function data output including a function to reference specific image data.

Finally, Applicants submit that in a review of Munyan it also was not seen to teach or to suggest the above features of Claim 1.

Therefore, for at least the foregoing reasons, Claim 1 is believed to be in condition for allowance. Further, Applicants submit that Claims 1, 9, 10 and 11 are believed to be in condition for allowance for at least the same reasons.

The remaining claims are each dependent from the independent claims discussed above and are therefore believed patentable for the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney may be reached in our Costa Mesa,  
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Respectfully submitted,

  
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